

New MS4 Requirements for Impaired Waters

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Case A: Unimpaired Waters

- Review and comment on draft verified lists and delist lists
- Manage discharges to avoid impairments/prevention

Case B: BMAP to Implement a TMDL

- Comply with BMAP
- Focus on sources
 - › Florida-friendly landscaping (FFL)
 - › Street sweeping
 - › Low impact design (LID)
- Get started as soon as possible

Case C: TMDLs and no BMAP Underway

New MS4 Permit Requirements:

1. TMDL Prioritization Report
2. TMDL Monitoring and Assessment Plan
3. TMDL Monitoring
4. TMDL Implementation Plan

TMDL Prioritization Report

- Schedule: Months 1-6
- List TMDL waters
- Develop evaluation factors
- Prioritize
- Schedule
- Report
- *Fecal coliform impairments (alternate process)

Prioritizing Waterbodies

- Is the TMDL adopted by DEP for a verified impaired water body?
- Is a BMAP currently under development or scheduled for development?
- Is the TMDL established by EPA for a State unverified impaired water body?
- Is the TMDL for a water body of local or regional significance/importance?
- Is the TMDL for a water body with public uses?
- Is the TMDL to address anthropogenic impairments?
- Is the TMDL for a water body for which we already have a stormwater master plan and retrofit projects planned or underway?

Prioritization Example

- EPA TMDL for nutrients
- EPA TMDL for fecals
- DEP TMDL for fecals, no BMAP
- DEP TMDL for DO, no BMAP
- DEP TMDL for nutrients, BMAP adopted
- DEP TMDL for nutrients, BMAP in development

Monitoring & Assessment Plan (slide 1 of 2)

- Schedule: Months 6-12, due on permit anniversary date
- ID top priority waterbody for assessment
- Monitoring & Assessment Plan's purpose:
 - › Prioritize outfalls and subbasins for additional BMP implementation

Elements of the Monitoring & Assessment Plan (slide 2 of 2)

- › Loads and Changes to Loads
 - Estimates of seasonal loads and EMCs
 - Estimates of loads from outfalls
 - Compare loads and trends
- › Rank outfalls based on loads
- › Validate results of the loading assessment

TMDL Monitoring

- Schedule: Months 12-36
- Conduct monitoring in plan
 - › Storm event monitoring
 - › SOPs/NELAC-certified
 - › Summary report
 - › Comparison of measured EMCs to estimates
 - › Revise plan based on results

TMDL Implementation Plan

- Schedule: Months 24 – 36
- Use monitoring results to prioritize reductions
- Submit supplemental SWMP
 - › Structural and nonstructural BMPs
 - › Program activities
 - › ID regional retrofit projects
 - › Strategy for BMP effectiveness monitoring
- Annual reporting

Collaboration with Other Sources

- Collaboration encouraged
- Equitable allocation and requirements among all sources

Fecal Coliform TMDLs

- ◎ Develop a *Bacterial Pollution Control Plan*
- ◎ Use the FDEP Fecal Coliform Tool Kit
- ◎ Plan elements:
 - › ID potential sources
 - › Refine knowledge through assessment and source tracking
 - › Adopt pet waste management ordinances
 - › Implement education
 - › Identify BMPs
 - › Report annually

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